

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 JANE DOE 1, individually and on  
11 behalf of all others similarly situated,

12 **Plaintiff,**

13  
14 **vs.**

15 MATTHEW WEISS, CALIFORNIA  
16 STATE UNIVERSITY, SAN  
17 BERNARDINO, BOARD OF  
18 TRUSTEES OF THE CALIFORNIA  
19 STATE UNIVERSITY, and KEFFER  
20 DEVELOPMENT SERVICES, LLC,  
21  
22  
23  
24  
25  
26  
27  
28

Case No.: 5:25-cv-00997-HDV-MBK

Assigned for All Purposes to:  
Courtroom 5B; Hon. Hernan D. Vera

**[PROPOSED] ORDER GRANTING  
MOTION FOR APPOINTMENT OF  
INTERIM LEAD COUNSEL**

**Hearing Information**

Date: June 5, 2025

Time: 10:00 a.m.

Courtroom: 5B

Complaint Filed: April 23, 2025

**[PROPOSED] ORDER**

This matter having come before the Court upon the application of Plaintiff Jane Doe 1 for the appointment of Jason Thompson of Sommers Schwartz, P.C. (“Sommers”), Yana Hart of Clarkson Law Firm, P.C. (“Clarkson”), and Megan Bonanni of Pitt McGehee Palmer Bonanni & Rivers, P.C. (“Pitt”), as Interim Lead Counsel on behalf of the putative Class (the “Application”), and the Court being fully advised in the premises;

**IT IS HEREBY ORDERED** that:

1. The Application be and the same hereby is GRANTED;
2. Pursuant to Rule 23(g) of the Federal Rules of Civil Procedure, Jason Thompson of Sommers Schwartz, P.C. (“Sommers”), Yana Hart of Clarkson Law Firm, P.C. (“Clarkson”), and Megan Bonanni of Pitt McGehee Palmer Bonanni & Rivers, P.C. (“Pitt”) shall be appointed Interim Lead Counsel to act on behalf of the putative Class;
3. Interim Lead Counsel shall have the following responsibilities and duties to perform or delegate as appropriate:
  - (a) to direct and execute on behalf of Plaintiff all pleadings and filings with the Court;
  - (b) to brief and argue motions;
  - (c) to initiate a Rule 26(f) conference and conduct discovery, including, without limitation, coordination of discovery with defendants’ counsel, the preparation of written interrogatories, requests for admissions, and requests for production of documents;
  - (d) to direct and coordinate the examination of witnesses in depositions;
  - (e) to appoint a spokesperson for Plaintiff at pretrial conferences;
  - (f) to call and chair meetings of Plaintiff’s counsel as appropriate or necessary from time to time;

- 1 (g) to initiate and conduct any settlement negotiations with counsel for  
2 Defendants;
- 3 (h) to provide general coordination of the activities of Plaintiff's counsel  
4 and to delegate work responsibilities to selected counsel as may be  
5 required in such a manner as to lead to the orderly and efficient  
6 prosecution of this litigation and to avoid duplicative or  
7 unproductive effort;
- 8 (i) to consult with and employ experts;
- 9 (j) to receive and review periodic time reports of all attorneys on behalf  
10 of Plaintiff, to determine if the time is being spent appropriately and  
11 for the benefit of Plaintiff, and to determine the allocation of any  
12 attorneys' fees;
- 13 (k) to direct all pre-trial proceedings, trial preparation, trials and post-  
14 trial proceedings; and
- 15 (l) to perform such other duties as may be required by the case or  
16 expressly authorized by further order of this Court.

17 4. This Order of Appointment is interim in nature and may be revoked or  
18 revisited by the Court if circumstances require.

19 **IT IS SO ORDERED.**

20 Dated: \_\_\_\_\_

21 \_\_\_\_\_  
22 Hon. Hernan D. Vera  
23 United States District Court Judge  
24  
25  
26  
27  
28